



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

**Request for Determination of Requirement
for Plan Approval/Operating Permit (RFD)**

(Submit in Triplicate)

03 AUG 13 PM 12:58
AIR QUALITY
REC'D

A. Application is being made for: *[please mark the appropriate case(s)]*

☒ Exemption from Plan Approval

☐ Exemption from Operating Permit

Physical Changes of Minor Significance

☐ Changes Do Not Add New Equipment (See 25 Pa. Code § 127.14(c)(1)). Physical changes of minor significance must not violate the terms of an operating permit, the Pennsylvania Air Pollution Control Act (APCA), the Clean Air Act or regulations adopted thereunder. In addition, these changes can not result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes may be made within seven (7) days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

☒ Changes Add New Equipment (See 25 Pa. Code § 127.14(c)(2)). Physical changes of minor significance must not violate the terms of an operating permit, the APCA, the Clean Air Act or regulations thereunder. In addition, these changes, which add new equipment, can not result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes can be made within 15 days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

See Page 4

C. Facility Name
Bulova Technologies LLC

Plant Name:
Bulova Technologies LLC

D. Mailing Address: PO BOX 4787, 101 N. Queen Street, Lancaster, PA 17604

E. Contact Person:
Richard P. Daniels

Title:
Maintenance Manager

F. Telephone Number:
717-299-2581

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

J. Location of Source(s):
4th floor of facility, 101 N. Queen Street, Lancaster, PA 17604

K. Municipality/Township:
City of Lancaster

County
Lancaster

I, _____, certify under penalty of law as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate and complete.

(Signed) Richard P. Daniels

Date: 08/05/2003

Name (typed) Richard P. Daniels

Title: Maintenance Manager

L. Estimated Emissions (*Attach calculations and basis for estimated emissions*):

Pollutant(s)	Emissions (lbs/hr)	Emissions (tons/year)
Ethylene Oxide	0.0094	0.019

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
RFD #2: Phillips CB Assembly - Soldering Exhaust to Scrubber	3/15/01	DEP Exempted - 2/2/01
RFD #3.1: Metal Finishing Department Metal Finishing Processes, Conformal Coating, Small Scale Cleaning and Lubricating	10/81	DEP Exempted - 6/6/03
RFD #3.2: Chemistry Laboratory Metal Finishing Processes and Small Scale Cleaning	10/81	DEP Exempted - 6/6/03
RFD #3.3: Printed Circuit Board A 1 Soldering Operations	4/01	DEP Exempted - 6/6/03
RFD #3.4: Printed Circuit Board A2 (Soldering Operations)	10/81	DEP Exempted - 6/6/03
RFD #3.5: 762 Line (Packaging/Stenciling/Sealing/Gluing/Bonding)	10/81	DEP Exempted - 6/6/03

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations?

☐ Yes ☒ No

OFFICIAL USE ONLY

Date Received: 8/13/03

Reviewed By: Gary Leuz

☒ A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9)).

☒ An operating permit is not required for this source. (See 25 Pa. Code § 127.443 (a)).

☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application.

Signature

Name and Title

Date

8/20/03

Ronald Davis, Chief NSR Section

B. This source is currently not used in the building. If purchased, a sterilization chamber will use ethylene oxide to sterilize used portable clinical analyzers returned for repair. Sterilization will be done in a clean, ventilated room isolated on the fourth floor.

Sterilization is accomplished by placing the used portable analyzers in a custom designed bag with a cartridge containing 17 grams of ethylene oxide. The bag will be heat-sealed and placed in the heated and ventilated sterilization chamber for 16 hours. When the cartridge is broken, the ethylene oxide dose will permeate the bag inside the chamber. The ethylene oxide gas then penetrates the bag membrane and is vented to the outside atmosphere. A maximum of 4 bags can be in the cabinet for a total capacity of 68 grams of EO.

Emissions from the gas will be very low. An estimate of 38 lbs of ethylene oxide per year is used for the emission calculations in this area. This figure is conservatively high because the sterilization unit will be used periodically to sterilize.

Schematic Flow Diagram:

Sterilization → Chamber → Atmosphere

L. Calculations:

Total emissions < 38 pounds/year

$(<38 \text{ lbs pounds/year}) / 260 \text{ days/year} = (<0.151 \text{ pounds/day})$

$(<0.151 \text{ pounds/day}/16 \text{ hours} = (<0.0094 \text{ pounds/hour})$



RECEIVED - DEP
CENTRAL REGION
03 AUG 13 PM 12:54
AIR QUALITY

August 11, 2003

Mr. Gary Lenz
PA DEP Bureau of Air Quality
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Dear Mr. Lenz,

Enclosed is a Request for Determination in triplicate. The application is being made in advance for a proposed sterilization unit that is planned for the fourth floor of our facility. The unit will be used for a new proposed product line.

The area is a sealed room in which the work is to be done. It is well ventilated and has an exhaust system that is currently not in use. The sterilization unit will be connected to the existing exhaust system. We anticipate very few emissions from the unit based on the design and operation of the unit.

I anticipate this area to be operational sometime in October, 2003. Please call me if you need further information.

Respectfully,

A handwritten signature in cursive script that reads "Rick Daniels".

Rick Daniels

Enclosure (3)



Pennsylvania Department of Environmental Protection

909 Elmerton Avenue
Harrisburg, PA 17110-8200
August 20, 2003

Southcentral Regional Office

717-705-4702
Fax 717-705-4830

Richard P. Daniels
Maintenance Manager
Bulova Technologies LLC
PO Box 4787
101 N. Queen Street
Lancaster, PA 17604

Re: Ethylene Oxide Sterilizer
Queen Street Plant
City of Lancaster, Lancaster County

Dear Mr. Daniels:

We are prepared to exempt the subject installation from the plan approval and operating permit requirements according to the information submitted and compliance with all other applicable Department rules and regulations.

Please ensure that a ventilation specialist or other qualified professional verifies that the existing exhaust system is appropriate for this addition. The location of air intakes, dead air spaces and other factors may create unhealthy concentrations within your building, the rooftop or neighboring area.

I am available at 717 - 705 - 4883 if you have any questions on this matter.

Sincerely,

Gary Lenz
Air Quality Program



cc: Case File, C
Lancaster Office
Permits